

Message

From: Irwin, Karen [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5A062F1D3A254CAB92AC2382AEC11C13-KIRWIN]
Sent: 12/19/2019 12:34:12 AM
To: Ruelas, Cynthia [RUELAS.CYNTHIA@EPA.GOV]
Subject: RE: questions for PCB cleanup sites

Thanks Cynthia!

Karen Irwin
U.S. EPA Region IX, LND-1-1
75 Hawthorne St.
San Francisco, CA 94105
(415) 947-4116

From: Ruelas, Cynthia
Sent: Wednesday, December 18, 2019 3:44 PM
To: Irwin, Karen <Irwin.Karen@epa.gov>
Subject: RE: questions for PCB cleanup sites

Hi Karen – please see my answers in red font below.

From: Irwin, Karen <Irwin.Karen@epa.gov>
Sent: Wednesday, December 18, 2019 3:16 PM
To: Ruelas, Cynthia <RUELAS.CYNTHIA@EPA.GOV>
Subject: questions for PCB cleanup sites

Hi Cynthia! Here's my list of questions for the sites so far. I'll be leaving on vacation after today so this is not a rush, just when you have time.

Thanks,
Karen

1. Active POLA sites – San Pedro and Wilmington
 - a. San Pedro site – is POLA testing areas immediately adjacent to the Site for PCBs? (this topic is mentioned in a paragraph in the conditional approval letter) (what areas are immediately adjacent?) I can't remember. I'll have to refer you to the RAW for this, or if it's not in there, I'll have to get back to you.
 - b. Wilmington – shall I reach out to Peter Garcia (DTSC) about testing for other COCs? No. During one of the conference calls I had with Mark Withrow with POLA, I asked him to reach out to DTSC regarding other COCs. If he has not, or does not intend to reach out to the State, talk to Steve Armann about this and let him instruct you as to whether or not you should reach out to State agency(ies) on your own, or whether you should keep pressing Mark Withrow to reach out himself.
2. Inactive POLA sites – has deed restriction/LUC been adopted or does EPA need to follow up with the State or POLA on this? POLA does not maintain deed restrictions/LUCs at their sites. Instead, they have what is called a Port Master Plan. This document identifies land uses for various properties within the Port. I'm almost certain that the inactive PCB POLA sites have been incorporated into the Master Plan, especially since I have been receiving O&M reports from POLA regarding some of the inactive sites, but you can reach out to Mark Withrow, and tell him that you would like to review the portions of the Master Plan that include these former PCB sites so that you can get a sense of what it looks like.

3. UPRR Leo Ave.

- a. The Nov. 2018 RAW Cynthia commented on proposes to transport excavated hazardous waste soil by rail instead of truck – was this suggested by EPA? (it counts as a greener cleanup measure) No, but it makes the most sense since the cleanup is taking place along a rail line. Once the remediation can get going, yes, it should count towards greener cleanups (yay!).
- b. Status of UP's revision to the RAW to address comments in EPA's April 2019 letter? Is another sampling event planned to test for other COCs? No, there is nothing planned at the moment for other COCs, and there likely will not be. Alerting the RP that there may be other potential COCs is part of my standard list of recommendations. However, I got a lot of push back from Janet O'Hara with the Water Board once I issued the letter to UP. She called me to tell me that if we are going to push the RP to look at other COCs, then she will no longer take part in overseeing this project. Since non-PCBs are not in our jurisdiction, and the Water Board is the only State agency overseeing this project, you may not have much of a choice here but to drop the issue.
- c. Any notes from discussion w/ Steve on dual agency oversight? Yes, EPA is working very closely with Mark Johnson with the Water Board on this, and the plan was for Mark to reach out to his supervisor to determine the best approach moving forward; either (1) we jointly issue an order for UPRR to cleanup the PCB contamination at their site [this is EPA's preferred option], or (2) we go after Sims Metal ourselves and issue them a letter requesting that they investigate potential historic and/or current migration of PCB contamination from their site onto UPRR's right of way.
- d. How was Cynthia coordinating with the City of San Jose for comments? (or was Mark Johnson coordinating with them?) As I recall, the City's comments did not raise any issues on the environmental work, so there wasn't any overlap between their comments and our comments from what I could tell. I kept the City in the loop with my comments. I never heard from the City on my comments. As far as coordination, you can just keep them in the loop with correspondences that you issue to UPRR.

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